

IN THE UNITED STATES DISTRICT COURT  
 DISTRICT OF SOUTH CAROLINA  
 COLUMBIA DIVISION

Prysmian Cables & Systems USA, LLC,

Plaintiff,

v.

Stephen J. Szymanski and Sterlite  
 Technologies, Inc.,

Defendants.

C/A No.: 3:21-cv-01641-SAL

**VERDICT FORM**

1. Do you the jury find by a preponderance of the evidence that any of the following alleged trade secrets are trade secrets? (*Choose either “Yes” or “No” for each alleged trade secret*)

Alleged Trade Secret	Yes	No
Claremont VBM	X	
Durango VBM	X	✗
Market Matrix Monitor	X	✗
“Plan to \$100 Million”	X	
5-Year Volumes Plan	X	
Management Plan 2017	X	
Price List Model	X	
SAP File	X	
Flex Ribbon Growth Plan	X	
Telecom Connectivity	X	

*If you answered YES for any alleged trade secret, proceed to question 2 (on page 2 of 7). If you answered NO for all the alleged trade secrets, have the jury foreperson sign and date the end of the verdict form (on page 7 of 7).*

2. Did defendants Stephen J. Szymanski or Sterlite Technologies, Inc. misappropriate any of the following trade secrets?

Alleged Trade Secret	Stephen J. Szymanski (Choose either "Yes" or "No")		Sterlite Technologies, Inc. (Choose either "Yes" or "No")	
	Yes	No	Yes	No
Claremont VBM	X		X	
Durango VBM		X		X
Market Matrix Monitor	X		X	
"Plan to \$100 Million"	X		X	
5-Year Volumes Plan		X		X
Management Plan 2017	X		X	
Price List Model	X		X	
SAP File	X		X	
Flex Ribbon Growth Plan	X		X	
Telecom Connectivity	X		X	

*If you answered YES for any alleged trade secret, proceed to question 3 (on page 3 of 7). If you answered NO for all the alleged trade secrets, have the jury foreperson sign and date the end of the verdict form.*

3. Do you find by a preponderance of the evidence that defendants Stephen J. Szymanski or Sterlite Technologies, Inc. were unjustly enriched by the misappropriation of any of the alleged trade secrets?

Alleged Trade Secret	Stephen J. Szymanski (Choose either "Yes" or "No")	Sterlite Technologies, Inc. (Choose either "Yes" or "No")		
	Yes	No	Yes	No
Claremont VBM	X		X	
Durango VBM		X		X
Market Matrix Monitor	X		X	
"Plan to \$100 Million"	X		X	
5-Year Volumes Plan		X		X
Management Plan 2017	X		X	
Price List Model	X		X	
SAP File	X		X	
Flex Ribbon Growth Plan	X		X	
Telecom Connectivity	X		X	

*If you answered YES for any alleged trade secret, proceed to question 4 (on page 4 of 7). If you answered NO for all the alleged trade secrets, have the jury foreperson sign and date the end of the verdict form (on page 7 of 7).*

4. Do you find by clear and convincing evidence that defendants Stephen J. Szymanski or Sterlite Technologies, Inc.'s misappropriation of the alleged trade secret(s) was willful and malicious OR that Stephen J. Szymanski or Sterlite Technologies, Inc. acted with willful, wanton, or reckless disregard of the rights of Prysmian Cables & Systems USA, LLC?

<b>Alleged Trade Secret</b>	<b>Stephen J. Szymanski</b> (Choose either "Yes" or "No")		<b>Sterlite Technologies, Inc.</b> (Choose either "Yes" or "No")	
	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Claremont VBM	✗		✗	
Durango VBM		✗		✗
Market Matrix Monitor	✗		✗	
"Plan to \$100 Million"	✗		✗	
5-Year Volumes Plan		✗		✗
Management Plan 2017	✗		✗	
Price List Model	✗		✗	
SAP File	✗		✗	
Flex Ribbon Growth Plan	✗		✗	
Telecom Connectivity	✗		✗	

*Proceed to questions 5a and 5b (on page 5 of 7).*

5a. We award **compensatory damages** to plaintiff Prysmian Cables & Systems USA, LLC, and against the defendant, **Stephen J. Szymanski**, for unjust enrichment in the total amount of

\$ 200,000.

5b. We award **exemplary damages** to plaintiff Prysmian Cables & Systems USA, LLC, and against the defendant, **Stephen J. Szymanski**, for unjust enrichment in the total amount of

\$ ∅.

*(Any exemplary damages you award must amount to no more than twice the sum of the compensatory damages that you attributed to defendant Stephen J. Szymanski.)*

*Proceed to questions 6a and 6b (on page 6 of 7).*

6a. We award **compensatory damages** to plaintiff Prysmian Cables & Systems USA, LLC, and against the defendant, **Sterlite Technologies, Inc.**, for unjust enrichment in the total amount of

\$ 96,500,000.

6b. We award **exemplary damages** to plaintiff Prysmian Cables & Systems USA, LLC, and against the defendant, **Sterlite Technologies, Inc.**, for unjust enrichment in the total amount of

\$ ∅.

*(Any exemplary damages you award must amount to no more than twice the sum of the compensatory damages that you attributed to defendant Sterlite Technologies, Inc.)*

*Proceed to the end of the verdict form (on page 7 of 7).*

End of Verdict Form:



Foreperson

Aug 9, 2024

Date